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**Subject:** Polymet-Application Discussion of existing Cliffs Erie Permits

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The Project, as discussed below, will refurbish and utilize certain facilities currently subject to two existing NPDES/SDS permits issued to Cliffs Erie, LLC (Cliffs Erie). These existing permits will not be applicable to the Project. The Cliffs Erie NPDES/SDS permits that are physically coextensive with certain areas within the Project are as follows:

Cliffs Erie Hoyt Lakes Tailings Basin Area NPDES/SDS Permit (Permit No. MN0054089) includes the existing former LTVSMC tailings basin that will be converted to the FTB in the Project and some of the former LTVSMC plant site that will be refurbished as part of the Plant Site for the Project.

Cliffs Erie Hoyt Lakes Mining Area NPDES/SDS Permit (Permit No. MN0042536) includes several former LTVSMC areas that will be refurbished for use at the Plant Site in the Project, including the Beneficiation Plant, the Area 1 and 2 shops, the SD026 outfall area (and pumpback system), and other associated facilities.

Reference to these existing Cliffs Erie NPDES/SDS permits also includes other applicable regulatory documents associated with these permits, such as the 2010 Consent Decree between the Minnesota Pollution Control Agency (MPCA) and Cliffs Erie. These existing permits also include many facilities and locations that will not be used in the Project. This application is limited to the former LTVSMC areas that will be used in the Project. PolyMet understands that MPCA will maintain or reissue Cliffs Erie's existing NPDES/SDS permits that cover areas and facilities that will also be subject to the NPDES/SDS permit issued for the NorthMet Project until after PolyMet has completed construction and began operation of the WWTP and FTB seepage capture systems for the Project. PolyMet expects that MPCA will provide both PolyMet and Cliffs Erie guidance as to the ongoing management of current water quality conditions associated with previous ferrous operations under Cliffs Erie's NPDES/SDS permits and transitioning of responsibilities under those existing NPDES/SDS permits to PolyMet. This NorthMet Project NPDES/SDS Permit Application, however, focuses on new nonferrous-related operations and the existing water quality conditions resulting from past operations and expected future operations.